

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 2**

**ST. ANTHONY COMMUNITY
HOSPITAL**

And

**1199SEIU UNITED HEALTHCARE
WORKERS EAST.**

Case No. 02-CA-278511

RESPONDENT’S MOTION TO RECHEDULE HEARING

Respondent St. Anthony Community Hospital (“Respondent”), by and through undersigned counsel, hereby submits this Motion for an Order to Reschedule the Hearing in the above-referenced matter, which is currently scheduled for February 23, 2022. As grounds for this Motion, Respondent states as follows:

1. This matter originally was scheduled for hearing on February 8, 2022. On January 7, 2022, the Regional Director for National Labor Relations Board, Region 2, issued an order rescheduling the videoconference hearing in this matter from February 8 to February 23, 2022.
2. Although Respondent was prepared to proceed with the hearing on February 8, Respondent’s legal counsel has a pre-scheduled conflict and will be unavailable from February 23-25, 2022. Respondent’s main witness also has a pre-scheduled conflict and will be unavailable from February 23-26, 2022.
3. Counsel for the Region, counsel for the Charging Party, and counsel for the Respondent have conferred and determined that all parties are available for a hearing in March or

April, except on the following dates: March 24-25, March 30, April 7-8, April 15, and April 18.

4. Counsel for the Charging Party has advised that the Charging Party does not oppose a brief adjournment of the hearing to the Administrative Law Judge's earliest available date in March or April, other than the dates specified above. Counsel for the Region has advised that the Region generally opposes the postponement on the grounds that it is more than 100 days after issuance of complaint.
5. This is Respondent's first request for a postponement, and postponing the hearing will not impair the orderly administration of this proceeding.
6. The Region has requested that this motion be directed to the Division of Judges.

For the foregoing reasons, Respondent St. Anthony Community Hospital respectfully requests that the National Labor Relations Board, Division of Judges enter an order to reschedule the hearing in the above-captioned matter for the earliest date in March or April 2022 that is convenient for the Administrative Law Judge and consistent with the parties' schedules, as set forth above.

Respectfully submitted,

Dated: January 25, 2022
New York, New York

/s/ Brian J. Clark
Brian J. Clark, Esq.
Karel Mazanec, Esq.
VENABLE LLP
1270 Avenue of the Americas, 24th Floor
New York, NY 10020
(212) 307-5500
BJClark@Venable.com

*Attorneys for Respondent St. Anthony
Community Hospital*

STATEMENT OF SERVICE

On January 25, 2022, I served a true copy of Respondent St. Anthony Community Hospital's Motion to Reschedule Hearing on all counsel of record via the NLRB's online portal, and by e-mailing the document as follows:

Counsel for the Charging Party

Jessica Harris, Esq.
Gladstein, Reif & Meginniss, LLP
39 Broadway, Suite 2430
New York, NY 10006
jharris@grmny.com

Counsel for the Region

Nicole Oliver, Esq.
National Labor Relations Board, Region 2
26 Federal Plaza, Rm 3614
New York, NY 10278
Nicole.Oliver@nrlrb.gov

/s/ Karel Mazanec
Karel Mazanec, Esq.